



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 26, 2015

JAMES S. GRIEN, TREASURER
NUNN FOR SENATE INC
PO BOX 78936
ATLANTA, GA 30357

Response Due Date
03/02/2015

IDENTIFICATION NUMBER: C00547414

REFERENCE: AMENDED OCTOBER QUARTERLY REPORT (07/01/2014 - 09/30/2014),
RECEIVED 10/15/2014

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Senate Public Records Office by the response date noted above. Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 6 item(s):

1. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$2,600 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f) (formerly 2 U.S.C. § 441a(a) and (f)); 11 CFR § 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

NUNN FOR SENATE INC

Page 2 of 7

Excessive contributions may be retained if, within 60 days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below.

For reattributions, excessive contributions from individuals can be retained if, within 60 days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(1).

NUNN FOR SENATE INC

Page 3 of 7

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 20(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund, redesignate, and/or reattribute the excessive amount will be taken into consideration.

2. Schedule A of your report discloses one or more contributions received after the 2014 primary election that are designated for the 2014 primary. These contributions may only be accepted to the extent that the committee has net debts outstanding from the 2014 primary election. For more information on how to calculate net debts outstanding, please see page 27 of the Campaign Guide for Congressional Candidates and Committees, which is available online at <http://www.fec.gov/pdf/candgui.pdf>. (11 CFR § 110.1(b)(3)(i))

A contribution is considered made when the contributor relinquishes control over the contribution. A contributor shall be considered to have relinquished control over the contribution when it is delivered to the candidate, when it is delivered to an authorized committee of the candidate, or to an agent of an authorized committee of the candidate. A contribution that is mailed to any of the aforementioned recipients will be considered made on the date of the postmark. Envelopes should be retained for the committee's records. (11 CFR § 110.1(b)(6))

If any contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If a contribution exceeds the amount of net debts outstanding from the 2014 primary election, you may have to refund or redesignate the contribution.

The funds can be retained if, within 60 days of receipt, the excessive amount was properly redesignated for a different election. An excessive contribution is

NUNN FOR SENATE INC

Page 4 of 7

considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election, or (2) the committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B))

If the foregoing conditions for redesignations are not met within 60 days of receipt, the excessive amount must be refunded. See 11 CFR § 103.3(b)(3).

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/or letters redesignating the contributions in question. Refunds are reported on Line 20(a), (b) or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund or redesignate the excessive amount will be taken into consideration.

3. Schedule A (see attached) discloses a contribution(s) from an individual(s) who has a mailing address outside of the United States of America. Please be advised that 52 U.S.C. § 30121(a) (formerly 2 U.S.C. § 441e(a)) and 11 CFR § 110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If your committee follows the safe harbor guidelines outlined under 11 CFR § 110.20(a)(7) for all contributions received from a foreign address to ensure

NUNN FOR SENATE INC

Page 5 of 7

that the sources of these contributions are not foreign nationals, please provide a detailed description of your procedures. These procedures must be used in all cases where a contributor or donor uses a foreign passport or passport number for identification purposes, provides a foreign address, makes a contribution or donation by means of a check or other written instrument drawn on a foreign bank or by wire transfer from a foreign bank, or resides abroad. A committee is deemed to have conducted a reasonable inquiry into the contributor or donor's nationality if you seek and obtain copies of current and valid U.S. passport papers for U.S. citizens. No person may rely on this safe harbor if he or she has actual knowledge that the source of the funds solicited, accepted, or received is a foreign national.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, any refunds should be disclosed on Schedule B supporting Line 20(a) of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution(s), prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

4. Schedule A of your report discloses one or more contributions that appear to be from limited liability corporation(s) (LLC) (see attached). 11 C.F.R. §110.1(g) allows the receipt of contributions from LLCs providing the LLC is treated as a partnership for tax purposes, and has not elected to be treated as a corporation by the Internal Revenue Service (IRS). Both LLCs that claim corporate status and those that publicly traded would be treated as corporations for FECA purposes.

Please amend your report to clarify if the LLCs in question are treated as partnerships. If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

NUNN FOR SENATE INC

Page 6 of 7

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

5. Your report discloses \$6,271.57 from Georgia Federal Elections Commission in Offsets to Operating Expenditures on Line 14 of the Detailed Summary Page. Please be advised that if there are not corresponding expenditures for these entries, it may constitute an excessive or prohibited contribution. Please amend your report or provide an explanation for this apparent discrepancy. (11 CFR § 104.3(a)(4)(v))

6. Commission Regulations require the continuous reporting of all outstanding debts. This report omits debts itemized on your previous report(s). (11 CFR §§ 104.3(d) and 104.11) Please file an amendment to your report to disclose the current status of these omitted debts:

The Feldman Group \$16,790.02

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

A written response or an amendment to your original report(s) correcting the above problems should be filed with the Senate Public Records Office. Please contact the Senate Public Records Office at (202) 224-0322 for instructions on how and where to file an amendment. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1395.

NUNN FOR SENATE INC

Page 7 of 7

Sincerely,

A handwritten signature in black ink that reads "Benjamin G. Holly". The signature is written in a cursive style with a large, stylized 'B' and 'H'.

Ben Holly
Senior Campaign Finance Analyst
Reports Analysis Division

417

Excessive, Prohibited, and Impermissible Contributions
Nunn for Senate, Inc. (C00547414)

Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
BOBICK, BRUCE	4/8/14	\$1,000.00	G2014
BOBICK, BRUCE	7/10/14	\$1,000.00	G2014
BOBICK, BRUCE	8/28/14	\$1,000.00	G2014
BOONE, DAVID	3/26/14	\$2,600.00	G2014
BOONE, DAVID WILLIAM	9/30/14	\$2,600.00	G2014
BOONE, DAVID WILLIAM	11/6/14	-\$1,000.00	G2014
BUTTENWEISER, CATHERINE F	5/16/14	\$500.00	G2014
BUTTENWIESER, CATHERINE F	7/28/14	\$2,600.00	G2014
DAVIS, WINIFRED	5/29/14	\$500.00	G2014
DAVIS, WINIFRED	6/23/14	\$1,000.00	G2014
DAVIS, WINIFRED	8/28/14	\$1,000.00	G2014
DAVIS, WINIFRED	9/30/14	\$1,000.00	G2014
EDWARDS, JAVARRO	2/25/14	\$2,600.00	G2014
EDWARDS, JAVARRO	6/9/14	\$500.00	G2014
EDWARDS, JAVARRO	6/9/14	\$1,000.00	G2014
EDWARDS, JAVARRO	7/9/14	\$500.00	G2014
EDWARDS, JAVARRO	8/9/14	\$500.00	G2014
EDWARDS, JAVARRO	9/3/14	-\$500.00	G2014
FISHER, EMILY H	7/15/14	\$1,000.00	G2014
FISHER, EMILY H	7/23/14	\$500.00	G2014
FISHER, EMILY H	9/6/14	\$2,600.00	G2014
GUERNSEY, SHERWOOD	6/30/14	\$250.00	G2014
GUERNSEY, SHERWOOD	9/25/14	\$2,600.00	G2014
HEERY, LAURA	9/5/14	\$2,600.00	G2014
HEERY, LAURA	9/11/14	\$2,600.00	G2014
Langdale Vallotton, LLP	8/14/14	\$1,000.00	G2014
Langdale Vallotton, LLP	8/14/14	\$1,000.00	G2014
Langdale Vallotton, LLP	8/14/14	\$1,000.00	G2014

Excessive, Prohibited, and Impermissible Contributions
Nunn for Senate, Inc. (C00547414)

LUTZ, CHRISTOPHER	5/25/14	\$500.00	G2014
LUTZ, CHRISTOPHER	6/25/14	\$500.00	G2014
LUTZ, CHRISTOPHER	7/25/14	\$500.00	G2014
LUTZ, CHRISTOPHER	8/25/14	\$250.00	G2014
LUTZ, CHRISTOPHER	8/25/14	\$500.00	G2014
LUTZ, CHRISTOPHER	9/25/14	\$500.00	G2014
MEADOWS, FELAND PHD	9/27/14	\$10.00	G2014
MEADOWS, FELAND PHD	9/27/14	\$25.00	G2014
MEADOWS, FELAND PHD	9/29/14	\$250.00	G2014
MEADOWS, FELAND PHD	9/29/14	\$2,500.00	G2014
MEBIUS, KARIN	6/27/14	\$200.00	G2014
MEBIUS, KARIN	7/23/14	\$25.00	G2014
MEBIUS, KARIN	8/31/14	\$1,800.00	G2014
MEBIUS, KARIN	9/3/14	\$1,000.00	G2014
MONTEAGUDO, CARLOS	9/30/13	\$1,000.00	G2014
MONTEAGUDO, CARLOS	10/21/13	\$1,000.00	G2014
MONTEAGUDO, CARLOS	1/14/14	\$600.00	G2014
MONTEAGUDO, CARLOS	9/25/14	\$1,000.00	G2014
MOUNTCASTLE, KATHARINE B	7/27/14	\$2,500.00	G2014
MOUNTCASTLE, KATHARINE B	9/25/14	\$500.00	G2014
MUNGER, PHILIP	6/30/14	\$2,600.00	G2014
MUNGER, PHILIP	9/30/14	\$2,600.00	G2014
SHERMAN-PALLADINO, AMY	8/22/14	\$2,600.00	G2014
PALLADINO, AMY	8/26/14	\$2,500.00	G2014
PATTULLO, EIZABETH	9/29/14	\$2,600.00	G2014
PATTULLO, ELIZABETH A	9/30/14	\$2,600.00	G2014
ROSS, DAVID G	6/26/14	\$2,500.00	G2014
ROSS, DAVID G	8/27/14	\$150.00	G2014
SANGSTON, ROBIN H	7/18/14	\$2,000.00	G2014
SANGSTON, ROBIN H	9/17/14	\$1,000.00	G2014

Excessive, Prohibited, and Impermissible Contributions
Nunn for Senate, Inc. (C00547414)

SAWYER, JACK JR	9/27/14	\$2,000.00	G2014
SAWYER, JACK JR	9/30/14	\$1,800.00	G2014
SIBLEY, JAMES M	6/2/14	\$2,600.00	G2014
SIBLEY, JAMES M	9/5/14	\$2,600.00	G2014
SMITH, MICHAEL	7/24/14	\$2,600.00	G2014
SMITH, MICHAEL	7/31/14	\$500.00	G2014
SMITH, MICHAEL	9/30/14	\$500.00	G2014
TERRILL, NANCY F	7/10/14	\$2,000.00	G2014
TERRILL, NANCY F	7/23/14	\$50.00	G2014
TERRILL, NANCY F	9/29/14	\$2,150.00	G2014
WALRAVEN, WES	4/30/14	\$2,600.00	G2014
WALRAVEN, WESLEY	8/11/14	\$2,000.00	G2014

Excessive Contributions from Committees

Contributor Name	Date	Amount	Election
AMERICA WORKS PAC	6/30/14	\$5,000.00	G2014
AMERICA WORKS PAC	9/2/14	\$5,000.00	G2014
MOVING AMERICA FORWARD PAC	12/31/13	\$2,500.00	G2014
MOVING AMERICA FORWARD PAC	6/30/14	\$1,500.00	G2014
MOVING AMERICA FORWARD PAC	9/30/14	\$2,000.00	G2014
OCEANS PAC	3/31/14	\$5,000.00	G2014
OCEANS PAC	9/25/14	\$5,000.00	G2014

Contributions from Individuals with Foreign Addresses

Contributor Name	Date	Amount	Election
CLARK, DIANA	8/7/14	\$2,600.00	G2014
O'CONNOR, JOHN	8/12/14	\$2,600.00	G2014
SCARDINO, JOHN	7/30/14	\$500.00	G2014
SCHARF, JUDY	8/5/14	\$500.00	G2014
WORTH, NICHOLAS	7/23/14	\$2,600.00	G2014

**Excessive, Prohibited, and Impermissible Contributions
Nunn for Senate, Inc. (C00547414)**

Contributions from Possible Prohibited Entities

Contributor Name	Date	Amount	Election
ANN GREGORY LLC	7/21/14	\$250.00	G2014
G. THOMAS CATOR LLC	7/21/14	\$1,000.00	G2014
LAURA M. SHAMP LLC	8/22/14	\$500.00	G2014
LAW OFFICES OF FREDERICK H. GRAEFE PLLC	7/21/14	\$500.00	G2014
MATTINGLY & ROSELIUS, PLLC	9/25/14	\$2,600.00	G2014
MCKENNEY AND JORDAN	9/11/14	\$500.00	G2014
OCONEE HEALTHCARE CENTER LLC	9/11/14	\$500.00	G2014
T & K KIRKWOOD INVESTMENT LLC	7/28/14	\$1,000.00	G2014
THE CHESTNUT FIRM LLC	7/17/14	\$2,000.00	G2014
TRACEY D. MASON, LLC	8/20/14	\$250.00	G2014